

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PERRY CIRALU, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

AMERICAN REALTY CAPITAL PROPERTIES,
INC., NICHOLAS S. SCHORSCH, DAVID S.
KAY, BRIAN BLOCK, AND LISA MCALISTER,

Defendants.

BERNARD PRIEVER, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

AMERICAN REALTY CAPITAL PROPERTIES,
INC., BRIAN BLOCK, AND LISA MCALISTER,

Defendants.

STUART RUBINSTEIN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

AMERICAN REALTY CAPITAL PROPERTIES,
INC., NICHOLAS S. SCHORSCH, BRIAN
BLOCK, AND LISA MCALISTER,

Defendants.

Electronically Filed

Civil Action No. 1:14-cv-08659-AKH

Judge Alvin K. Hellerstein

Electronically Filed

Civil Action No. 1:14-cv-08668-AKH

Judge Alvin K. Hellerstein

Electronically Filed

Civil Action No. 1:14-cv-08669-AKH

Judge Alvin K. Hellerstein

**DECLARATION OF JOSEPH R. SEIDMAN, JR. IN
SUPPORT OF MOTION OF THE STATE TEACHERS RETIREMENT
SYSTEM OF OHIO AND THE OHIO PUBLIC EMPLOYEES RETIREMENT
SYSTEM FOR CONSOLIDATION OF RELATED ACTIONS,
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

KEVIN PATTON, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

AMERICAN REALTY CAPITAL PROPERTIES,
INC., NICHOLAS S. SCHORSCH, BRIAN
BLOCK, AND LISA MCALISTER,

Defendants.

BERNEY HARRIS, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

AMERICAN REALTY CAPITAL PROPERTIES,
INC., NICHOLAS S. SCHORSCH, DAVID S.
KAY, BRIAN BLOCK, AND LISA MCALISTER,

Defendants.

SIMON ABADI, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

vs.

AMERICAN REALTY CAPITAL PROPERTIES,
INC., NICHOLAS S. SCHORSCH, DAVID S.
KAY, PETER M. BUDKO, BRIAN S. BLOCK,
LISA E. BEESON, WILLIAM M. KAHANE,
EDWARD M. WEIL, JR., LESLIE D.
MICHELSON, EDWARD G. RENDELL, AND
SCOTT J. BOWMAN,

Defendants.

Electronically Filed

Civil Action 1:14-cv-08671-AKH

Judge Alvin K. Hellerstein

Electronically Filed

Civil Action No. 1:14-cv-08740-AKH

Judge Alvin K. Hellerstein

Electronically Filed

Civil Action No. 1:14-cv-09006-AKH

Judge Alvin K. Hellerstein

THE CITY OF TAMPA GENERAL
EMPLOYEES RETIREMENT FUND, Individually
and on Behalf of All Others Similarly Situated,

Plaintiff,

vs.

AMERICAN REALTY CAPITAL
PROPERTIES, INC., NICHOLAS S.
SCHORSCH, DAVID S. KAY, BRIAN
BLOCK, PETER M. BUDKO, EDWARD M.
WEIL, JR., BRIAN D. JONES, WILLIAM M.
KAHANE, EDWARD G. RENDELL,
WALTER P. LOMAX, JR., LESLIE D.
MICHELSON, SCOTT J. BOWMAN,
MERRILL LYNCH, PIERCE, FENNER &
SMITH INC., CITIGROUP GLOBAL
MARKETS INC., BARCLAYS CAPITAL
INC., J.P. MORGAN SECURITIES LLC,
CAPITAL ONE SECURITIES INC., CREDIT
SUISSE SECURITIES (USA) LLC,
DEUTSCHE BANK SECURITIES INC.,
WELLS FARGO SECURITIES, LLC,
ROBERT W. BAIRD & CO. INC.,
LADENBURG THALMANN & CO. INC.,
BMO CAPITAL MARKETS CORP., JMP
SECURITIES LLC, JANNEY
MONTGOMERY SCOTT LLC, MIZUHO
SECURITIES USA INC., PNC CAPITAL
MARKETS LLC, PIPER JAFFRAY & CO.,
AND RBS SECURITIES INC.,

Defendants.

Electronically Filed

Civil Action No. 1:14-cv-10134

Judge Alvin K. Hellerstein

I, JOSEPH R. SEIDMAN, JR., hereby declare as follows:

1. I am a senior associate with the law firm of Bernstein Liebhard LLP (“Bernstein Liebhard”). I make this declaration in support of the accompanying Motion of The State Teachers Retirement System of Ohio and The Ohio Public Employees Retirement System for Consolidation of Related Actions, Appointment as Lead Plaintiff and Approval of Lead Counsel. The matters set forth herein are stated within my personal knowledge.

2. Attached hereto are true and correct copies of the following documents:

Exhibit 1: Press Release;

Exhibit 2: Sworn certification of William J. Neville, General Counsel for State Teachers Retirement System of Ohio (“STRS Ohio”); and sworn certification of Julie Becker, General Counsel for Ohio Public Employees’ Retirement System (“OPERS”);

Exhibit 3: Chart evidencing STRS Ohio and OPERS’ losses; and

Exhibit 4: Firm resumes for Bernstein Liebhard LLP and Berman DeValerio.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 29th day of December, 2014, at New York, New York.

/s/ Joseph R. Seidman, Jr.

JOSEPH R. SEIDMAN, JR.